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E-556-1

UNITED STATES DEPARTMENT OF
COMMERCE
NEWS

WASHINGTON, D.C. 20230

BUREAU OF
EXPORT
ADMINISTRATION

FOR IMMEDIATE RELEASE:

July 17, 1997
www.bxa.doc.gov
BXA-97-25

CONTACTS: Susan Hofer
Eugene Cottilli
(202) 482-2721

**SETTLEMENT REACHED WITH
TELECOMMUNICATIONS COMPANY**

(WASHINGTON) The Commerce Department announced today that it has reached a settlement with I.G.G. Corporation, King of Prussia, Pa., a wholly-owned subsidiary of IGG Component Technology, Ltd., Portsmouth, England, in a case involving violations of the Commerce Department regulation that implements the Enhanced Proliferation Control Initiative. EPCI was established in 1991 to prevent any exports of products to end-users which are known or believed to be involved with the development of weapons of mass destruction.

The civil settlement announced today resolves allegations that on 40 separate occasions I.G.G. exported U.S.-origin electronic equipment valued in excess of \$461,000 from the United States to the United Kingdom, knowing that the goods were intended for end-use by the Indian Space Research Organization (ISRO) without obtaining the required export licenses.

In May 1992 the U.S. Department of State imposed trade sanctions against ISRO, based on its missile proliferation activities. In part, these sanctions prohibited ISRO from receiving U.S. exports for which a validated export license or reexport authorization was required for a two year period. On September 3, 1992 BXA issued an "Is Informed Letter" to I.G.G. under the authority of EPCI advising that an individual export license or reexport authorization was required for all exports to ISRO.

I.G.G. settled with the Commerce Department's Bureau of Export Administration (BXA) and will pay a \$400,000 administrative penalty. I.G.G. was also denied export privileges for a seven-year period. The denial period was suspended for seven years, and will thereafter be waived if the company does not violate U.S. export control laws during the period of suspension.

-MORE-

As part of the global settlement, I.G.G. also pleaded guilty today to a one-count criminal information charging it with knowingly exporting electronic components from the United States to ISRO without the required export licenses, in violation of the Export Administration Act. United States District Court Judge, the Honorable Clarence C. Newcomer, in Philadelphia, PA. assessed I.G.G. a \$50,000 criminal fine, a special assessment of \$200 and placed the company on probation for five years.

The conviction of I.G.G. and both the criminal and administrative fines and penalties imposed against the firm were the result of a three-year joint investigation by BXA's New York Office of Export Enforcement, the United States Attorney for the Eastern District of Pennsylvania and the United States Customs Service, Philadelphia, PA

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The conviction of I.G.G. and both the criminal and administrative fines and penalties imposed against the firm were the result of a three-year joint investigation by BXA's New York Office of Export Enforcement, the United States Attorney for the Eastern District of Pennsylvania and the United States Customs Service, Philadelphia, PA

E-556-5

UNITED STATES DEPARTMENT OF COMMERCE
BUREAU OF EXPORT ADMINISTRATION
WASHINGTON, D.C. 20230

In the Matter of:)
)
I.G.G. CORPORATION)
1012 West Eighth Avenue)
King of Prussia, Pennsylvania 19406,)
)
Respondent)

ORDER

The Office of Export Enforcement, Bureau of Export Administration, United States Department of Commerce (BXA), having notified I.G.G. Corporation (I.G.G.) of its intention to initiate an administrative proceeding against it pursuant to Section 13(c) of the Export Administration Act of 1979, as amended (50 U.S.C.A. app. §§ 2401-2420 (1991 & Supp. 1997)) (the Act),¹ and the Export Administration Regulations (61 Fed. Reg. 12734-13041, March 25, 1996, to be codified at 15 C.F.R. Parts 730-774) (the Regulations),² based on allegations that, on 40 separate occasions

¹ The Act expired on August 20, 1994. Executive Order 12924 (3 C.F.R., 1994 Comp. 917 (1995)), extended by Presidential Notice on August 15, 1995 (3 C.F.R., 1995 Comp. 501 (1996)), and extended again on August 14, 1996 (61 Fed. Reg. 42527, August 15, 1996), continued the Regulations in effect under the International Emergency Economic Powers Act (50 U.S.C.A. §§ 1701-1706 (1991 & Supp. 1997)).

² The alleged violations occurred in 1992 and 1993. The Regulations governing the violations at issue are found in the 1992 and 1993 versions of the Code of Federal Regulations (15 C.F.R. Parts 768-799 (1992 and 1993)). Those Regulations define the violations that BXA alleges occurred and are referred to hereinafter as the former Regulations. Since that time, the Regulations have been reorganized and restructured; the restructured Regulations, to be codified at 15 C.F.R. Parts 730-774, establish the procedures that apply to the matters set forth in this Order.

between on or about September 18, 1992 and July 9, 1993, after receiving notice from BXA advising it that an individual validated export license or reexport authorization was required for all shipments to the Indian Space Research Organization (ISRO), I.G.G. exported U.S.-origin electronic equipment from the United States to the United Kingdom, knowing that the goods were intended for ultimate end use by ISRO without obtaining the individual validated export license required by BXA's September 8, 1992 notice, in violation of Section 787.6 of the former Regulations;

BXA and I.G.G. having entered into a Settlement Agreement pursuant to Section 766.18(a) of the Regulations whereby they agreed to settle this matter in accordance with the terms and conditions set forth therein, and the terms of the Settlement Agreement having been approved by me;

IT IS THEREFORE ORDERED:

FIRST, that a civil penalty of \$400,000 is assessed against I.G.G., which shall be paid in accordance with the following schedule: payment of \$50,000 of the civil penalty shall be paid within 30 days of the date of entry of this Order; payment of the remaining \$350,000 shall be made in seven equal installments of \$50,000, due annually on or before the anniversary date of the first payment. Payment shall be made in the manner specified in the attached instructions.

SECOND, that, for a period of seven years from the date of this Order, I.G.G. and all of its successors or assigns, officers,

representatives, agents, and employees, may not participate, directly or indirectly, in any way in any transaction involving any commodity, software, or technology (hereinafter collectively referred to as "item") exported or to be exported from the United States that is subject to the Regulations, or in any other activity subject to the Regulations, including, but not limited to:

- A. Applying for, obtaining, or using any license, License Exception, or export control document;
- B. Carrying on negotiations concerning, or ordering, buying, receiving, using, selling, delivering, storing, disposing of, forwarding, transporting, financing, or otherwise servicing in any way, any transaction involving any item exported or to be exported from the United States that is subject to the Regulations, or in any other activity subject to the Regulations; or
- C. Benefiting in any way from any transaction involving any item exported or to be exported from the United States that is subject to the Regulations, or in any other activity subject to the Regulations.

THIRD, that no person may, directly or indirectly, do any of the following:

- A. Export or reexport to or on behalf of the denied person any item subject to the Regulations;
- B. Take any action that facilitates the acquisition or attempted acquisition by the denied person of the

ownership, possession, or control of any item subject to the Regulations that has been or will be exported from the United States, including financing or other support activities related to a transaction whereby the denied person acquires or attempts to acquire such ownership, possession or control;

- C. Take any action to acquire from or to facilitate the acquisition or attempted acquisition from the denied person of any item subject to the Regulations that has been exported from the United States;
- D. Obtain from the denied person in the United States any item subject to the Regulations with knowledge or reason to know that the item will be, or is intended to be, exported from the United States; or
- E. Engage in any transaction to service any item subject to the Regulations that has been or will be exported from the United States and that is owned, possessed or controlled by the denied person, or service any item, of whatever origin, that is owned, possessed or controlled by the denied person if such service involves the use of any item subject to the Regulations that has been or will be exported from the United States. For purposes of this paragraph, servicing means installation, maintenance, repair, modification or testing.

FOURTH, that, after notice and opportunity for comment as provided in Section 766.23 of the Regulations, any person, firm, corporation, or business organization related to the denied person by affiliation, ownership, control, or position of responsibility in the conduct of trade or related services may also be made subject to the provisions of this Order.

FIFTH, that this Order does not prohibit any export, reexport, or other transaction subject to the Regulations where the only items involved that are subject to the Regulations are the foreign-produced direct product of U.S.-origin technology.

SIXTH, that as authorized by Section 766.18 of the Regulations, the denial period set forth in paragraph SECOND above shall be suspended for seven years beginning on the date of entry of this Order, and shall thereafter be waived, provided that, during the period of suspension, I.G.G. commits no violation of the Act or any regulation, order, or license issued thereunder.

SEVENTH, that the proposed Charging Letter, the Settlement Agreement, and this Order shall be made available to the public.

This Order, which constitutes the final agency action in this matter, is effective immediately.

Frank W. Deliberti

Frank W. Deliberti
Acting Assistant Secretary
for Export Enforcement

Entered this 17th day of July, 1997.

UNITED STATES DEPARTMENT OF COMMERCE
BUREAU OF EXPORT ADMINISTRATION
WASHINGTON, D.C. 20230

In the Matter of:)
)
I.G.G. CORPORATION)
1012 West Eighth Avenue)
King of Prussia, Pennsylvania 19406,)
)

Respondent)

SETTLEMENT AGREEMENT

This Agreement is made by and between I.G.G. Corporation (I.G.G.) and the Bureau of Export Administration, United States Department of Commerce, pursuant to Section 766.18(a) of the Export Administration Regulations (61 Fed. Reg. 12734-13041, March 25, 1996, to be codified at 15 C.F.R. Parts 730-774) (the Regulations),¹ issued pursuant to the Export Administration Act of 1979, as amended (50 U.S.C.A. app. §§ 2401-2420 (1991 & Supp. 1997)) (the Act).²

¹ The alleged violations occurred in 1992 and 1993. The Regulations governing the violations at issue are found in the 1992 and 1993 versions of the Code of Federal Regulations (15 C.F.R. Parts 768-799 (1992 and 1993)). Those Regulations define the violations that BXA alleges occurred and are referred to hereinafter as the former Regulations. Since that time, the Regulations have been reorganized and restructured; the restructured Regulations, to be codified at 15 C.F.R. Parts 730-774, establish the procedures that apply to the matters set forth in this Settlement Agreement.

² The Act expired on August 20, 1994. Executive Order 12924 (3 C.F.R., 1994 Comp. 917 (1995)), extended by Presidential Notices of August 15, 1995 (3 C.F.R., 1995 Comp. 501 (1996)) and August 14 1996 (61 Fed. Reg. 42527, August 15, 1996), continued the Regulations in effect under the International Emergency Economic Powers Act (50 U.S.C.A. §§ 1701-1706 (1991 & Supp. 1997)).

Whereas, the Office of Export Enforcement, Bureau of Export Administration, United States Department of Commerce (BXA), has notified I.G.G. of its intention to initiate an administrative proceeding against it pursuant to the Act and the Regulations, based on allegations that, on 40 separate occasions between on or about September 18, 1992 and July 9, 1993, after receiving notice from BXA advising it that an individual validated export license or reexport authorization was required for all shipments to the Indian Space Research Organization (ISRO), I.G.G. exported U.S.-origin electronic equipment from the United States to the United Kingdom, knowing that the goods were intended for ultimate end use by ISRO, without obtaining the individual validated export license required by BXA's September 8, 1992 notice, in violation of Section 787.6 of the former Regulations;

Whereas, I.G.G. has reviewed the proposed Charging Letter and is aware of the allegations made against it and the administrative sanctions which could be imposed against it if the allegations are found to be true; it fully understands the terms of this Settlement Agreement and the proposed Order; it enters into this Settlement Agreement voluntarily and with full knowledge of its rights, and it states that no promises or representations have been made to it other than the agreements and considerations herein expressed;

Whereas, I.G.G. neither admits nor denies the allegations contained in the proposed Charging Letter;

Whereas, I.G.G. wishes to settle and dispose of all matters alleged in the proposed Charging Letter by entering into this Settlement Agreement; and

Whereas, I.G.G. agrees to be bound by an appropriate Order giving effect to the terms of this Settlement Agreement, when entered (appropriate Order);

Now Therefore, I.G.G. and BXA agree as follows:

1. BXA has jurisdiction over I.G.G., under the Act and the Regulations, in connection with the matters alleged in the proposed Charging Letter.

2. BXA and I.G.G. agree that the following sanctions shall be imposed against I.G.G. in complete settlement of all violations of the Act and the former Regulations set forth in the proposed Charging Letter:

- a. I.G.G. shall be assessed a civil penalty of \$400,000, which shall be paid in accordance with the following payment schedule: payment of \$50,000 of the civil penalty shall be made within 30 days of the date of entry of the appropriate Order; payment of the remaining \$350,000 shall be made in seven equal installments of \$50,000 each, due annually on or before the anniversary date of the first payment.
- b. I.G.G. and all its successors or assigns, officers, representatives, agents, and employees, may not, for a period of seven years from the date of entry of an appropriate Order, participate, directly or indirectly,

in any way in any transaction involving any commodity, software, or technology (hereinafter collectively referred to as "item") exported or to be exported from the United States that is subject to the Regulations, or in any other activity subject to the Regulations, including, but not limited to:

- i. Applying for, obtaining, or using any license, License Exception, or export control document;
 - ii. Carry on negotiations concerning, or ordering, buying, receiving, using, selling, delivering, storing, disposing of, forwarding, transporting, financing, or otherwise servicing in any way, any transaction involving any item exported or to be exported from the United States that is subject to the Regulations, or in any other activity subject to the Regulations; or
 - iii. Benefitting in any way from any transaction involving any item exported or to be exported from the United States that is subject to the Regulations, or in any other activity subject to the Regulations.
- c. BXA agrees that, pursuant to Section 766.18 of the Regulations, the denial period set forth in paragraph 2(b) shall be suspended for seven years from the date of entry of an appropriate Order, and shall thereafter be waived, provided that, during the period of

suspension, I.G.G. commits no violation of the Act or any regulation, order, or license issued thereunder.

3. I.G.G. agrees that, subject to the approval of this Settlement Agreement pursuant to paragraph 8 hereof, it hereby waives all rights to further procedural steps in this matter (except with respect to any alleged violations of this Settlement Agreement or the appropriate Order, when entered), including, without limitation, any right: (a) to an administrative hearing regarding the allegations in the proposed Charging Letter; (b) to request a refund of the civil penalty imposed pursuant to this Settlement Agreement and the appropriate Order, when entered; and (c) to seek judicial review or otherwise to contest the validity of this Settlement Agreement or the appropriate Order, when entered.

4. BXA agrees that, upon entry of an appropriate Order, it will not initiate any administrative proceeding against I.G.G., or any officer, director, employee, or shareholder of I.G.G., in connection with any violation of the Act or the Regulations alleged in the proposed Charging Letter.

5. I.G.G. understands that BXA will make the proposed Charging Letter, this Settlement Agreement, and the appropriate Order, when entered, available to the public.

6. BXA and I.G.G. agree that this Settlement Agreement is for settlement purposes only. Therefore, if this Settlement Agreement is not accepted and an appropriate Order is not issued by the Assistant Secretary for Export Enforcement pursuant to


Section 766.18(a) of the Regulations, BXA and I.G.G. agree that they may not use this Settlement Agreement in any administrative or judicial proceeding and that neither party shall be bound by the terms contained in this Settlement Agreement in any subsequent administrative or judicial proceeding.

7. No agreement, understanding, representation or interpretation not contained in this Settlement Agreement may be used to vary or otherwise affect the terms of this Settlement Agreement or the appropriate Order, when entered, nor shall this Settlement Agreement serve to bind, constrain, or otherwise limit any action by any other agency or department of the United States Government with respect to the facts and circumstances addressed herein.

8. This Settlement Agreement shall become binding on BXA only when the Assistant Secretary for Export Enforcement approves it by entering an appropriate Order, which will have the same force and effect as a decision and order issued after a full administrative hearing on the record.

BUREAU OF EXPORT ADMINISTRATION
U.S. DEPARTMENT OF COMMERCE

I.G.G. CORPORATION


Acting for

Mark D. Menefee
Acting Director
Office of Export Enforcement

Date: 7-16-97



Michael Garvey
Executive Vice President
I.G.G. Corporation

Date: June 26, 1997



E-556-17
UNITED STATES DEPARTMENT OF COMMERCE
Bureau of Export Administration
Washington, D.C. 20230

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

I.G.G. Corporation
1012 West Eighth Avenue
King of Prussia, Pennsylvania 19406

Attention: Michael Garvey
Executive Vice President

Dear Mr. Garvey:

The Office of Export Enforcement, Bureau of Export Administration, United States Department of Commerce (BXA), hereby charges that, as described in detail below, I.G.G. Corporation (I.G.G.) has violated the Export Administration Regulations (61 Fed. Reg. 12734-13041, March 25, 1996, to be codified at 15 C.F.R. Parts 730-774) (the Regulations),¹ issued pursuant to the Export Administration Act of 1979, as amended (50 U.S.C.A. app. §§ 2401-2420 (1991 & Supp. 1997)) (the Act).²

Facts constituting violations:

CHARGES 1-40

On or about September 8, 1992, I.G.G. was informed by BXA, in accordance with the provisions of Section 778.7(c) of the former Regulations, that an individual validated export license or reexport authorization was required for all shipments to the Indian Space Research Organization (ISRO). Subsequently, on 40 separate occasions between on or about September 18, 1992 and on or about

¹ The alleged violations occurred in 1992 and 1993. The Regulations governing the violations at issue are found in the 1992 and 1993 versions of the Code of Federal Regulations (15 C.F.R. Parts 768-799 (1992 and 1993)). Those Regulations define the violations that BXA alleges occurred and are referred to hereinafter as the former Regulations. Since that time, the Regulations have been reorganized and restructured; the restructured Regulations, to be codified at 15 C.F.R. Parts 730-774, establish the procedures that apply to the matters set forth in this letter.

² The Act expired on August 20, 1994. Executive Order 12924 (3 C.F.R., 1994 Comp. 917 (1995)), extended by Presidential Notices of August 15, 1995 (3 C.F.R., 1995 Comp. 501 (1996)) and August 14, 1996 (61 Fed. Reg. 42527, August 15, 1996), continued the Regulations in effect under the International Emergency Economic Powers Act (50 U.S.C.A. §§ 1701-1706 (1991 & Supp. 1997)).



July 9, 1993, as identified more fully on the enclosed schedule, which is incorporated herein by this reference, I.G.G. exported U.S.-origin electronic equipment from the United States to the United Kingdom knowing that each of those exports was intended for ultimate end use by ISRO. Each of these exports was made without the individual validated export license required by BXA's September 8, 1992 notice. BXA alleges that, by exporting U.S.-origin commodities to any person or destination or for any use in violation of or contrary to the terms of the Act, or any regulation, order, or license issued thereunder, I.G.G. committed 40 separate violations of Section 787.6 of the former Regulations.

Accordingly, I.G.G. is hereby notified that an administrative proceeding is instituted against it pursuant to Section 13(c) of the Act and Part 766 of the Regulations for the purpose of obtaining an Order imposing administrative sanctions, including any or all of the following:

Imposition of the maximum civil penalty allowed by law of \$10,000 per violation (see Section 764.3(a)(1) of the Regulations);

Denial of export privileges (see Section 764.3(a)(2) of the Regulations); and/or

Exclusion from practice (see Section 764.3(a)(3) of the Regulations).

Copies of relevant Parts of the Regulations are enclosed.

If I.G.G. fails to answer the charges contained in this letter within 30 days after being served with notice of issuance of this letter as provided in Section 766.6 of the Regulations, that failure will be treated as a default under Section 766.7.

I.G.G. is further notified that it is entitled to an agency hearing on the record as provided by Section 13(c) of the Act and Section 766.6 of the Regulations, if a written demand for one is filed with its answer, to be represented by counsel, and to seek a settlement.

Pursuant to an Interagency Agreement between BXA and the U.S. Coast Guard, the U.S. Coast Guard is providing administrative law judge services, to the extent that such services are required under the Regulations, in connection with the matters set forth in this letter. Accordingly, I.G.G.'s answer should be filed with the U.S. Coast Guard ALJ Docketing Center, 40 S. Gay Street, Baltimore, Maryland 21202-4022, in accordance with the instructions in Section 766.5(a) of the Regulations. In addition, a copy of I.G.G.'s answer should be served on BXA at the address set forth in

Section 766.5(b), adding "ATTENTION: Thomas C. Barbour, Esq." below the address. Mr. Barbour may be contacted by telephone at (202) 482-5311.

Sincerely,

Mark D. Menefee
Acting Director
Office of Export Enforcement

Enclosures

E-556-20

**I.G.G. CORPORATION
SCHEDULE OF VIOLATIONS**

CHARGE NO.	EXPORTED ON OR ABOUT	COMMODITY	INTENDED ULTIMATE DESTINATION	AIR WAYBILL #	INVOICE #	PURCHASE ORDER#
1	9/18/92	ELEC COMPONENTS	INDIA ISRO	24561725	I-241	SH
2	10/2/92	ELEC COMPONENTS	INDIA ISRO	24563766	I-262	7263/SH
3	10/9/92	ELEC COMPONENTS	INDIA ISRO	24563910	I-278	7246/SH
4	10/16/92	ELEC COMPONENTS	INDIA ISRO	24564061	I-285	0119/SH
5	10/23/92	ELEC COMPONENTS	INDIA ISRO	24568806	I-0301	0054/SH
6	10/30/92	ELEC COMPONENTS	INDIA ISRO	24567830	I-0307	0100/SH
7	11/6/92	ELEC COMPONENTS	INDIA ISRO	24478624	I-0324	0075/SH
8	11/13/92	ELEC COMPONENTS	INDIA ISRO	21526783	I-0335	0122/SH
9	11/20/92	ELEC COMPONENTS	INDIA ISRO	21526820	I-0352	0117/SH
10	12/1/92	ELEC COMPONENTS	INDIA ISRO	24566102	I-0366	0107/SH
11	12/4/92	ELEC COMPONENTS	INDIA ISRO	24466960	I-0374	0102/SH
12	12/11/92	ELEC COMPONENTS	INDIA ISRO	24467763	I-0391	0120/SH
13	12/18/92	ELEC COMPONENTS	INDIA ISRO	24468975	I-0400	0101/SH
14	1/4/93	ELEC COMPONENTS	INDIA ISRO	24470036	I-0422	0172/SH
15	1/8/93	ELEC COMPONENTS	INDIA ISRO	24470051	I-0430	0115/SH

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CHARGE NO.	EXPORTED ON OR ABOUT	COMMODITY	INTENDED ULTIMATE DESTINATION	AIR WAYBILL #	INVOICE #	PURCHASE ORDER#
16	1/15/93	ELEC COMPONENTS	INDIA ISRO	24478731	I-0441	0117/SH
17	1/29/93	ELEC COMPONENTS	INDIA ISRO	24470202	I-0460	0101/SH
18	2/5/93	ELEC COMPONENTS	INDIA ISRO	24474096	I-0478	7245/SH
19	2/12/93	ELEC COMPONENTS	INDIA ISRO	24470364	I-0497	0120/SH
20	2/19/93	ELEC COMPONENTS	INDIA ISRO	24476502	I-0515	0171/SH
21	2/26/93	ELEC COMPONENTS	INDIA ISRO	40068276	I-0533	0173/SH
22	3/5/93	ELEC COMPONENTS	INDIA ISRO	24477600	I-0553	0101/SH
23	3/12/93	ELEC COMPONENTS	INDIA ISRO	24475452	I-0576	0301/SH
24	3/19/93	ELEC COMPONENTS	INDIA ISRO	24475474	I-0593	0303/SH
25	3/25/93	ELEC COMPONENTS	INDIA ISRO	25157694	I-0604	0280/SH
26	4/2/93	ELEC COMPONENTS	INDIA ISRO	24475544	I-0631	0173/SH
27	4/8/93	ELEC COMPONENTS	INDIA ISRO	24475566	I-0641	0302/SH
28	4/16/93	ELEC COMPONENTS	INDIA ISRO	25160483	I-0663	0280/SH
29	4/23/93	ELEC COMPONENTS	INDIA ISRO	24477891	I-0681	0302/SH
30	4/30/93	ELEC COMPONENTS	INDIA ISRO	25161113	I-0711	0307/SH
31	5/7/93	ELEC COMPONENTS	INDIA ISRO	25164624	I-0730	0173/SH
32	5/14/93	ELEC COMPONENTS	INDIA ISRO	24464532	I-0759	0173/SH
33	5/21/93	ELEC COMPONENTS	INDIA ISRO	25161301	I-0796	0176/SH

E-556-23

CHARGE NO.	EXPORTED ON OR ABOUT	COMMODITY	INTENDED ULTIMATE DESTINATION	AIR WAYBILL #	INVOICE #	PURCHASE ORDER#
34	5/28/93	ELEC COMPONENTS	INDIA ISRO	25161334	I-0807	0173/SH
35	6/3/93	ELEC COMPONENTS	INDIA ISRO	24464742	I-0829	0178/SH
36	6/10/93	ELEC COMPONENTS	INDIA ISRO	24464313	I-0849	0409/SH
37	6/17/93	ELEC COMPONENTS	INDIA ISRO	24464683	I-0867	0280/SH
38	6/25/93	ELEC COMPONENTS	INDIA ISRO	25281362	I-0894	0280/SH
39	7/2/93	ELEC COMPONENTS	INDIA ISRO	24470445	I-0907	0409/SH
40	7/9/93	ELEC COMPONENTS	INDIA ISRO	25286214	I-0915	0303/SH